

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

IN RE:

RICKY M. FARRIS
xxx-xx-2579
1625 Crown Point Dr.
Frisco, TX 75034

LILLIAN FARRIS
xxx-xx-1234

DEBTOR(S)

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CASE NO.18-40413
CHAPTER 13

RESPONSE TO MOTION FOR RELIEF FROM AUTOMATIC STAY PURSUANT TO 11 U.S.C.
§362(A) AS TO 1625 CROWN POINT DRIVE, LITTLE ELM, TEXAS 75034 AND WAIVER OF
THE THIRTY DAY REQUIREMENT PURSUANT TO 11 U.S.C. § 362(e)

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

Ricky M. Farris and Lillian Farris, Debtor herein, filing this Response to Motion of U.S. BANK TRUST NATIONAL ASSOCIATION, AS TRUSTEE OF THE IGLOO SERIES III TRUST, for Relief from Automatic Stay, and hereby objecting to same, respectfully shows as follows:

1. Debtor(s) admits the allegations of paragraph 1 to 6.
2. Debtor(s) denies the allegations of paragraph 7 to 13.

DATED: September 28, 2020

Respectfully submitted,

BARRON & CARTER, L.L.P.
P. O. BOX 1347
NEDERLAND, TEXAS 77627
(409) 727-0073

BY: /s/ Diane S. Carter
DIANE S. CARTER
TBA NO. 24043310
ATTORNEY FOR DEBTOR

CERTIFICATE OF SERVICE

I hereby certify that on September 28, 2020, a true and correct copy of the above and forgoing Response to Motion of U.S. BANK TRUST NATIONAL ASSOCIATION, AS TRUSTEE OF THE IGLOO SERIES III TRUST shall be served via electronic means, if available, otherwise by regular, first class mail, to....

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US Trustee
Office of the U.S. Trustee
110 N. College Ave.
Suite 300
Tyler, TX 75702

This service complies with Local Rules of Bankruptcy Procedure 9013(e).

/s/ Diane S. Carter
DIANE S. CARTER